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Attorney for Defendant
BERNADETTE ESCUE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
v.
BERNADETTE ESCUE,
Defendant

) No. CR 07-00610 JF
)
)
EX PARTE APPLICATION FOR ORDER
)
PERMITTING TRAVEL, SUBMITTED
)
WITH THE APPROVAL OF THE AUSA AND
)
PRETRIAL SERVICES; DECLARATION OF
)
COUNSEL
)
)

Defendant Bernadette Escue, through counsel, applies for permission to travel to and from Spokane, Washington from May 9-11, 2008, to collect her son's belongings from college and to drive back to the Bay Area.

This application is submitted after consultation with the AUSA and the supervising Pretrial Services Officer, both of whom have informed counsel that they have no objection to this request.

This Application is based on the attached *Declaration Of Counsel*. A proposed order accompanies this application.

Dated: April 30, 2008

Respectfully submitted,

/S/
Mark R. Vermeulen
Attorney for Defendant
BERNADETTE ESCUE

DECLARATION OF COUNSEL

I, Mark R. Vermeulen, declare:

1. I am an attorney duly admitted to practice before this Court and I represent Defendant Bernadette Escue in this action.

2. I request that Ms. Escue be permitted to travel to and from Spokane, Washington from May 9-11, 2008, to collect her son's belongings from college and to drive back to the Bay Area.

3. I have spoken with Pretrial Services Officer Tim Elder, who is assigned to this case, and with AUSA Joe Fazioli, each of whom informed me that he has no objection to this request.

4. I will email a copy of this *Application* and the accompanying *[Proposed] Order Permitting Travel* to Pretrial Services Officer Tim Elder on the same date I file this via ECF, and a copy of each will be provided to AUSA Joe Fazioli automatically via ECF filing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 30, 2008 at San Francisco, CA.

/S/
Mark R. Vermeulen